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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION

Plaintiff,

ELODIA SANCHEZ

Plaintiff-Intervenor,

v.

EVANS FRUIT CO., INC.

No. CV-10-3033-LRS

PLAINTIFFS' JOINT MOTION
TO QUASH A SUBPOENA
FOR MID VALLEY
COMMUNITY CLINIC AND
SUNNYSIDE COMMUNITY
HOSPITAL PURSUANT TO
FED. R. CIV. P. 45(c)

1
2 Defendant, and
3 JUAN MARIN AND ANGELITA
MARIN, a marital community,
4 Defendant- Intervenor.
5

6 Plaintiffs respectfully move the court pursuant to Fed. R. Civ. P.
7 45(c)(3)(A)(iii) for an order quashing subpoenas requiring Mid Valley Community
8 Clinic and Sunnyside Hospital (“Clinics”) to produce all records in their
9 possession, custody, and control relating to Class Members Esmeralda Aviles,
10 Vanessa Aviles, Carina Gutierrez, and Veronica Reyna (“Class Members”)
11 between January 1, 2005 and the present. Plaintiff Equal Employment Commission
12 moves the court for an order quashing on behalf of all four Class Members listed
13 above. Northwest Justice Project joins the motion on behalf of Class Members
14 Esmeralda Aviles and Vanessa Aviles. The subpoenas call for the records to be
15 produced on December 27, 2011. Alternatively, if the court declines to quash the
16 subpoenas, Plaintiffs respectfully move the court to modify the subpoenas so as to
17 require the Clinics to produce only unprivileged records that are relevant to the
18 issue of emotional distress damages. This motion is supported by a separately filed
19 Memorandum of Law.
20

21 DATED this 21st day of December, 2011.

1 NORTHWEST JUSTICE PROJECT

2 BY: s/ Blanca E. Rodriguez

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CERTIFICATE OF SERVICE

I Alex Galarza hereby certify that on this 21st day of December 2011,
I electronically filed the foregoing with the Clerk of Court using the CM/ECF
system which will send notification of such filing and also sent to each
individual's email address below:

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